

1 A. I was. I just let them lapse because I'm,
2 obviously, a pretty busy guy and didn't bother to
3 retake the test.

4 Q. So the answer is, no, you're not board
5 certified?

6 A. Well, I think the term is board eligible.

7 Q. Okay. As far as Dr. Goldsmith, what did
8 he do wrong in his evaluation of this case?

9 A. Boy, you got 20 minutes? Do you want me
10 to go through all the issues?

11 Q. Yeah. I want you to tell me why a jury
12 should believe you over him.

13 MR. COLÓN: That's a different question.

14 BY MR. ROBB:

15 Q. Well, there's the question. Why should a
16 jury believe you over Dr. Goldsmith?

17 MS. FORGEY: Objection. Form.

18 A. Well, Dr. Goldsmith is an epidemiologist.
19 I don't see his qualifications or research experience
20 for understanding the causes of cancer generally,
21 which would then apply to the causes of leukemia.

22 I've spent my life in a laboratory and
23 actually conducting the epidemiology studies,
24 Dr. Goldsmith hasn't.

25 And so the types of things I've done is

1 the experiments in people to look at what might cause
2 cancer, what the cancer mechanisms are. I have an
3 understanding of dose response relationship that I
4 don't see from either of your experts, Dr. Frank or
5 Dr. Goldsmith.

6 I understand the differences in risks and
7 how they actually apply to people. I have looked at
8 patients in the eye and actually explained to them
9 what are the causes of cancer when they ask. I've
10 done extensive occupational histories of probably
11 thousands of patients.

12 And I think I could probably look at my CV
13 and talk about even more, but I don't know that
14 Dr. Goldsmith has ever been on an NIH study section
15 panel that looks at grant reviews for people asking
16 for money to study the causes of cancer. I actually
17 don't see any publications, but maybe he's got one or
18 two on his CV, but certainly nothing recently. And
19 so I can go on from there, but I think that's a
20 pretty good overview.

21 **Q. Well, he did work for the National**
22 **Institutes of Health, correct?**

23 **A. Which institute?**

24 **Q. National Institutes of Health.**

25 **A. So which institute?**

1 State of Ohio :
 2 SS:
 3 County of Franklin:

4 I, PETER G. SHIELDS, M.D., do hereby
 5 certify that I have read the foregoing transcript of
 6 my deposition given on May 9, 2014; that together
 7 with the correction page attached hereto noting
 8 changes in form or substance, if any, it is true and
 9 correct.

10 _____
 11 PETER G. SHIELDS, M.D.

12 I do hereby certify that the foregoing
 13 transcript of the deposition of PETER G. SHIELDS,
 14 M.D., was submitted to the witness for reading and
 15 signing; that after he had stated to the undersigned
 16 Notary Public that he had read and examined his
 17 deposition, he signed the same in my presence on the
 18 _____ day of _____, _____.

19 _____
 20 Notary Public

21 My commission expires _____
 22 - - -
 23
 24
 25

CERTIFICATE

State of Ohio :
SS:
County of Knox :

I, Ann Ford, Notary Public in and for the State of Ohio, duly commissioned and qualified, certify that the within named witness was by me duly sworn to testify to the whole truth in the cause aforesaid; that the testimony was taken down by me in stenotypy in the presence of said witness, afterwards transcribed upon a computer; that the foregoing is a true and correct transcript of the testimony given by said witness taken at the time and place in the foregoing caption specified.

I certify that I am not a relative, employee, or attorney of any of the parties hereto, or of any attorney or counsel employed by the parties, or financially interested in the action.

IN WITNESS WHEREOF, I have set my hand and affixed my seal of office at Columbus, Ohio, on this 14th day of May, 2014.

Ann Ford
ANN FORD, Notary Public
in and for the State of Ohio
and Registered Professional
Reporter

My Commission expires: April 18, 2016

